

MEMO ENDORSED

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March 22, 2012

PRIVILEGED - IN CAMERA REVIEW

Via Fax - 914-390-4095

Hon. George A. Yanthis

United States District Court for the Southern District of New York

Hon. Charles L. Brieant Jr. Federal Building

United States Courthouse - Room 421

300 Quarropas Street

White Plains, New York 10601-4150

RE: *Bozella v. County of Dutchess, et al*
10 Civ. 4917 (SDNY)

Dear Judge Yanthis:

Enclosed herewith for Your Honor's in camera review are copies of the email exchanges between the Defendant William O'Neill and William Grey. There are actually two not three emails; see #3 on the enclosed Privileged Log. Plaintiff seeks discovery of these emails pursuant to a demand for discovery and inspection served upon Defendant William O'Neill that requests copies of documents concerning any communications between Defendant O'Neill and any witness or potential witness. Defendants have objected to the disclosure of these emails as privileged attorney work product. Mr. Grey was reached out to at our request at our request as part of our initial investigation of this matter. Thus, we believe they are protected material not subject to disclosure.

Respectfully submitted,

Michael K. Burke
Michael K. Burke

MKB:vc

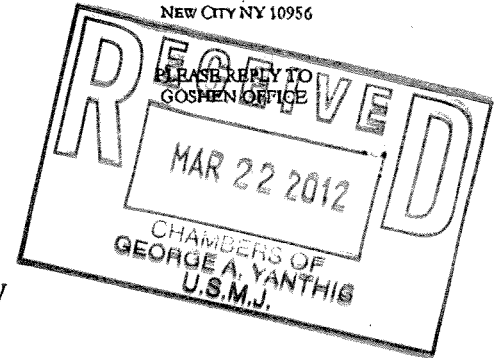
c: Shauna K. Friedman, Esq.

Wilmer Hale (w/o enclosure)

The Court has reviewed the referenced emails in camera and concludes they would be entitled to attorney work product privilege. In any event, said emails are not relevant to any claim or defense in this matter. So ordered. *George A. Yanthis*, USDC, 3/28/12

ROCKLAND COUNTY OFFICE:

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USDC SDNY
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